

**IN THE DISTRICT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

Defendant.

CASE NO. 6:13-cr-00170-JMC-1

**DECLARATION IN SUPPORT OF  
DEFENDANT'S ACCEPTANCE OF  
AMENDED PETITION TO ENTER PLEA  
OF GUILTY (ECF #222) ON CONDITION  
TO CORRECTION AND REQUEST TO  
FORGIVE FOR MISTAKE**

I, GORDON L. HALL declare as follows:

1. I am competent to state the matters set forth herein;
2. I have first-hand knowledge of the facts stated herein;
3. All the facts herein stated are true, correct and complete, admissible as evidence. If called upon as a witness, I will testify to their veracity;
4. I am a Defendant in this instant Case;
5. I am giving notice of my conditional acceptance to the "AMENDED PETITION TO ENTER PLEA OF GUILTY" (ECF #222) dated February 18, 2014, hereinafter "PLEA;"
6. I accept the PLEA on condition that the PLEA is corrected to reflect "Yes" instead of "No" to question #42(a) in the PLEA. Additionally on condition that ECF #225 "PETITION FOR ENTRY OF AMENDED PLEA AGREEMENT OR EXTENSION OF TIME [filed concurrently with DECLARATION IN SUPPORT OF PETITION FOR ENTRY OF AMENDED PLEA AGREEMENT OR EXTENSION OF TIME]" is incorporated into the PLEA as an integral part of the PLEA (ECF #222);

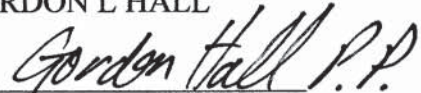
7. My mistake was a misconception that ECF #225 would automatically be incorporated into the plea agreement of February 7, 2014, and subsequently into the plea agreement of February 18, 2014 (ECF #222), the "PLEA," pursuant to the Government's non response to the E-Mails of February 13<sup>th</sup> and February 16<sup>th</sup> 2014 as the apparent intent of the parties made manifest by their actions, including but not limited to similar contracts concerning ECF #'s 82, 192, 193, 225, et cetera as the true intent of the parties that the matter having been properly resolved by the Government and the Defendant agreeing to recommend the provisions of ECF #192 as a particular sentence proper for the disposition of this instant Case; and
8. My mistake was realizing that "No" on question #42(a) of the PLEA corresponded and was correct under Traditional Contract Law, however, under Modern Contract Law the answer to question #42(a) of the PLEA should have been "Yes" in accordance with ECF #192 as made manifest by the Record.

I, GORDON L HALL, hereby declare under penalty of perjury under the Laws of the United States of America that the above is true, correct, and complete to the best of my knowledge.

Witness my hand and seal this 20<sup>th</sup> day of February 2014.

Respectfully submitted,

GORDON L HALL

A handwritten signature in black ink, reading "Gordon Hall P.P.", written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on the 20<sup>th</sup> day of February 2014, I did cause Donald Westover to furnish via United States Postal Service a true and correct copy of a **DEFENDANT'S ACCEPTANCE OF AMENDED PETITION TO ENTER PLEA OF GUILTY (ECF #222) ON CONDITION TO CORRECTION AND REQUEST TO FORGIVE FOR MISTAKE and DECLARATION IN SUPPORT OF DEFENDANT'S ACCEPTANCE OF AMENDED PETITION TO ENTER PLEA OF GUILTY (ECF #222) ON CONDITION TO CORRECTION AND REQUEST TO FORGIVE FOR MISTAKE** for filing in this Court in the above matter, by mailing a copy to UNITED STATES OF AMERICA, c/o William J Watkins, Jr, US Attorneys Office, 55 Beattie Place, Suite 700, Greenville, South Carolina 29601.

Please see CERTIFICATE OF SERVICE attached hereto.

Respectfully submitted this 20<sup>th</sup> day of February 2014,

GORDON L HALL

Gordon Hall P.D.



## CERTIFICATE OF SERVICE

It is hereby certified that on the date noted below, the undersigned mailed to:

UNITED STATES OF AMERICA  
c/o William J Watkins, Jr  
US Attorneys Office (Gville)  
55 Beattie Place, Suite 700  
Greenville, South Carolina 29601


**Serviced By: USPS**

hereinafter, "Recipient," the documents and sundry papers pertaining to Case #: 6:13-cr-00170-JMC-1, as follows:

- 1) **DEFENDANT'S ACCEPTANCE OF AMENDED PETITION TO ENTER PLEA OF GUILTY (ECF #222) ON CONDITION TO CORRECTION AND REQUEST TO FORGIVE FOR MISTAKE**, dated February 20<sup>th</sup>, 2014 (2 leaves);
- 2) **DECLARATION IN SUPPORT OF DEFENDANT'S ACCEPTANCE OF AMENDED PETITION TO ENTER PLEA OF GUILTY (ECF #222) ON CONDITION TO CORRECTION AND REQUEST TO FORGIVE FOR MISTAKE**, dated February 20<sup>th</sup>, 2014 (2 leaves); and
- 3) Reference copy of this **CERTIFICATE OF SERVICE**, dated February 20<sup>th</sup>, 2014 (1 leaf).

This mailing contained a total of five (5) leaves. It was sent via the United States Postal Service under the control, direction, and instruction of the Service as referenced above. The aforesaid mailing was placed in a postpaid envelope properly addressed to the Recipient. It was deposited at an official depository under the exclusive care and custody of the United States Postal Service within the State of California.

20 February 2014  
DATE

  
Donald Westover  
25731 Via Viento  
Mission Viejo, California [92691]

**LEGAL NOTICE** The Witness named above is a Federal Witness Pursuant to TITLE 18, PART I, CHAPTER 73, SEC. 1512. *Tampering with a witness, victim, or an informant.* Intimidating a third party witness under Color of Law is a violation of Title 18, U.S. Code, Section 242, titled "Deprivation of Rights Under Color of Law," which primarily governs police misconduct investigations. This Statute makes it a crime for any person acting under the Color of Law to willfully deprive any individual residing in the United States and/or United States of America those rights protected by the Constitution and U.S. laws.